

Exhibit C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEW JERSEY COALITION OF
AUTOMOTIVE RETAILERS, INC.,

Plaintiff,

v.

MAZDA MOTOR OF AMERICA, INC.

Defendant.

Case No. 3:18-cv-14563-BRM-TJB

DECLARATION OF ADAM KRAUSHAAR

I, Adam Kraushaar declare:

1. I am the owner and dealer principal of Lester Glenn Mazda. I have personal knowledge of the facts stated herein.

2. Lester Glenn Mazda is a Mazda dealership located at 1408 Route 9, Toms River, NJ 08755. I have owned Lester Glenn Mazda since February 2010.

3. Lester Glenn Mazda is a member of the New Jersey Coalition of Automotive Retailers, Inc. ("NJ CAR"). Lester Glenn Mazda has been a member of NJ CAR [for as long as I have owned the dealership/since February 2010].

4. I understand that Mazda Motor of America, Inc. d/b/a Mazda North American Operations ("Mazda") has a dealer support program known as the "Mazda Brand Experience Program 2.0 ("MBEP").

5. Lester Glenn Mazda has participated in the MBEP since its inception in July 2018.

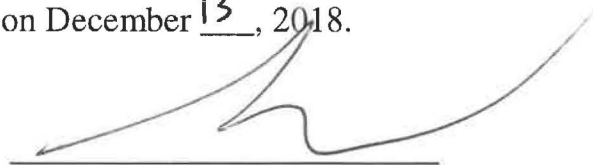
6. I do not believe that Lester Glenn Mazda has been harmed by its participation in the MBEP.

7. I understand that NJ CAR has filed a lawsuit against Mazda seeking a ruling that it is unlawful for Mazda to implement the MBEP in New Jersey (the "Action").

8. I did not direct NJCar to file the Action.

9. I believe that the Action is contrary to the interests of my dealership, and I cannot support it. If the MBEP is declared unlawful, Lester Glenn Mazda will be harmed because (among other things) it will no longer be able to recover the costs it incurred to comply with the MBEP criteria through future MBEP bonus payments.

I declare under penalty of perjury that the foregoing is true and correct.
Executed in Toms River, New Jersey on December 13, 2018.

A handwritten signature in black ink, appearing to read 'Adam Kraushaar', is written over a horizontal line.

Adam Kraushaar